Table 1. Estimating Veolia's Operating Parameter Limits (OPLs) Updated: 6/22/2012

Unit #	Metal	Metal Feed Rates During 2008 Testing (lb/hr)[a]	Highest 12-hr Rolling Average Metal Feed Rate 7/1/04-1/1/08 (lb/hr)	Highest 12-hr Rolling Average Metal Feedrate (lbs/hr), from June 7, 2012	Test Feed Rate As a % of the Highest 12-hr Rolling Average of Historical Values	Was Testing Done at ≥ Highest 12-hr Historical Rates?[b]	Was Testing Done at ≥ Median 12-hr Historical Rates?[b]	Veolia's 3/2/10 Proposed Extrapolated Feedrate (lb/hr)[c]	EPA's Proposed OPLs (lb/hr)[d]	Est. Stack Conc. @ Veolia's Proposed OPLs (µg/dscm @ 7% O_2)[e]	Est. Stack Conc. @ EPA's Proposed OPLs (µg/dscm @ 7% O_2)[e]	HWC MACT Limit (40 C.F.R. § 63.1219); µg/dscm @ 7% O_2
2	Hg	0.00165	0.0054	0.0064	31%	No	Yes	0.0057	0.00165	183	53	130
	LVM	47.2	84.5	68.5	56%	No	Yes	140	68.5	20	10	92
	SVM	63.6	50.6	91.0	126%	No	Yes	189	91.0	65	31	230
3	Hg	0.0018	0.00545	0.0059	33%	No	Yes	0.0057	0.0018	181	57	130
	LVM	47.7	77.3	77.8	62%	No	Yes	143	77.8	70	38	92
	SVM	64.3	72.1	81.6	89%	No	Yes	193	81.6	173	73	230
4	Hg	0.0214	0.05981	0.060	36%	No	Yes	0.078	0.021	89	24	130
	LVM	50.3	69.9	77.3	72%	No	Yes	151	77.3	30	15	92
	SVM	63.6	58.4	98.1	109%	No	Yes	191	98.1	81	42	230

Notes

a. Feed rate calculated by EPA in March 2010 using calculated Hg spike composition & offsite waste feed concentrations.

b. In general, feed rates that fall within the top 10-25% of historical 12-hour rolling average rates may be considered for extrapolation.

c. Calculated by escalating the metal feed rate during testing by a factor of 3.

d. No extrapolation is recommended for Hg because the test feed rates were too low (< 50% of the highest historical rate). For Unit 4, EPA needs an acceptable analysis of the corresponding activated carbon injection rate at higher feed rates. If the test feed rate is higher than the highest historical 12-hour feed rate (e.g., SVM from Units 2 & 4), use the test feed rate. For LVM (Units 2, 3, 4) and SVM (Unit 3), extrapolate up to the highest historical feed rate.

e. Stack concentrations are estimated from exhaust parameters and "removal efficiencies" reported by Veolia in the March 2010 application, except that Hg removal efficiencies were re-calculated by EPA. (Todd Ramaly Memo, March 26, 2010)